

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

RALPH S. JANVEY, in his capacity as
Court-appointed receiver for the Stanford
Receivership Estate; PAM REED;
SAMUEL TROICE; and MICHOACAN
TRUST; individually and on behalf of a
class of all others similarly situated,
Plaintiffs,

v.

GREENBERG TRAURIG, LLP;
HUNTON & WILLIAMS, LLP; AND
YOLANDA SUAREZ,
Defendants.

CIVIL ACTION NO. 3:12-cv-04641-N

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE
TO FILE SECOND AMENDED COMPLAINT**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

NOW COME Plaintiffs, Ralph S. Janvey, in his capacity as the Court-Appointed Receiver for the Stanford Receivership Estate, Pam Reed, Samuel Troice, and Michoacan Trust individually and on behalf of a class of all others similarly situated, and file this Unopposed Motion for Leave to File Second Amended Complaint.

Certificate of Counsel

1. Counsel for Defendants are unopposed to this motion.

MOTION FOR LEAVE

2. Plaintiffs seek leave to amend to add Greenberg Traurig, PA as a defendant. On November 2, 2018, Greenberg Traurig, LLP answered the amended complaint, disclosing that it did not come into existence until 1999 and that some of the Greenberg Traurig attorneys, whose conduct is the subject of the complaint, were and are employees of Greenberg Traurig, PA.

3. Leave to amend should be freely given, *Robertson v. Plano City of Texas*, 70 F.3d 21, 22 (5th Cir. 1995), unless there is a reason justifying denial, such as: (1) undue delay; (2) bad faith or dilatory motive by the party seeking leave to amend; (3) repeated failure to cure deficiencies by amendments previously allowed; (4) undue prejudice to the opposing party by virtue of allowance of the amendment; or (5) futility of amendment. *Martin's Herend Imports, Inc. v. Diamond & Gem Trading U.S. Co.*, 195 F.3d 765, 770 (5th Cir. 1999). None of these reasons exist here.

4. For these reasons, Plaintiffs seek leave to file the Amended Complaint attached hereto as Exhibit "A."

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that this Court grant leave to file the Amended Complaint.

Respectfully Submitted,

NELIGAN LLP

By: /s/ Douglas J. Buncher

Douglas J. Buncher
dbuncher@neliganlaw.com
Republic Center
325 N. St. Paul, Suite 3600
Dallas, Texas 75201
Telephone: (214) 840-5320
Facsimile: (214) 840-5301

CASTILLO SNYDER

By: /s/ Edward C. Snyder

Edward C. Snyder
esnyder@casnlaw.com
Jesse R. Castillo
jcastillo@casnlaw.com
700 N. St. Mary's, Suite 405
San Antonio, Texas 78205
Telephone: (210) 630-4200
Facsimile: (210) 630-4210

CLARK HILL STRASBURGER

By: /s/ Judith R. Blakeway

Judith R. Blakeway
judith.blakeway@clarkhillstrasburger.com
2301 Broadway
San Antonio, Texas 78215
Telephone: (210) 250-6004
Facsimile: (210) 258-2706

By: /s/ David N. Kitner

David N. Kitner
david.kitner@clarkhillstrasburger.com
901 Main Street, Suite 4400
Dallas, Texas 75202
Telephone: (214) 651-4300
Facsimile: (214) 651-4330

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of November, 2018, the foregoing Motion was served on all counsel of record via the Court's ECF system.

/s/ Judith R. Blakeway

Judith R. Blakeway